

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

THE GOODYEAR TIRE & RUBBER
COMPANY,

Plaintiff,

V.

CONAGRA FOODS, INC., *et al.*,

Defendants.

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) Case No. 2:20-cv-06347-JLG-EPD
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)
) PLAINTIFF’S RULE 26(a)(1) INITIAL
) DISCLOSURES AND 26(a)(2) EXPERT
) DISCLOSURES
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**PLAINTIFF'S RULE 26(a) INITIAL DISCLOSURES AND
PLAINTIFF'S RULE 26(a)(2) EXPERT DISCLOSURES**

Plaintiff The Goodyear Tire & Rubber Company (“Plaintiff” or “Goodyear”), by and through the undersigned counsel of record, submits these Rule 26(a) Initial Disclosures and Rule 26(a)(2) Expert Disclosures.

Rule 26(a)(1) Initial Disclosures

For its Rule 26(a)(1) Initial Disclosures, Plaintiff states the following:

Rule 26(a)(1)(A)(i): The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1. The following Central Soya Co., Inc. (“Central Soya”) former employee may have discoverable information about waste streams delivered to the Site and/or operations: Jerri Thibaut. The last known contact information in Plaintiff’s possession for such employee is as follows:

Bunge North America, Inc.
1391 Timberlake Manor Pkwy
Chesterfield, MO 63017

2. The following Chemical Waste Management, Inc. (“Chemical Waste”) former employees may have been involved in response activities conducted at the Site by Chemical Waste and its subcontractors, and may have discoverable information about such response activities and associated response costs: Bill Magee; Suzy McCoy; Patrick T. O'Shea, and Lauren Paisley. This entity is a Jackson County Landfill consultant and/or subcontractor, and all communications must be directed to Plaintiff's counsel of record.

3. The following Davis Trucking (“Davis”) former employee may have discoverable information about waste streams delivered to the Site and/or operations: Bob Lovett. The last known contact information in Plaintiff's possession for such employee is as follows:

Davis Trucking
1134 Schwilk Rd.
Lancaster, OH 43130

4. The following Clean Harbors Environmental Services, Inc. (“Clean Harbors”) former employee may have been involved in response activities conducted at the Site by Clean Harbors and its subcontractors, and may have discoverable information about such response activities and associated response costs: William Butcher. This entity is a Jackson County Landfill consultant and/or subcontractor, and all communications must be directed to Plaintiff's counsel of record.

5. The following ENSCO, Inc. (“ENSCO”) current or former employees may have discoverable information about waste streams delivered to the Site and/or operations: John T. Corcia; and Kim Hendricks. The last known contact information in Plaintiff's possession for such employees is as follows:

ENSCO, Inc.
333 Executive Court
Little Rock, AR 72205

6. The following Federal Mogul Corp. (“Federal Mogul”) current or former employees may have discoverable information about waste streams delivered to the Site and/or operations: Mark T. Bauer; Kevin Cassidy; Kirk MacLennen; Brett Pynonnen; and Robert Wolke. The last known contact information in Plaintiff’s possession for such employees is as follows:

Federal Mogul
26555 Northwestern Hwy
Southfield, MI 48033

7. The following Geo-Environmental Drilling Company, Inc (“Geo-Environmental”) current or former employee may have been involved in response activities conducted at the Site by Parsons Corporation (“Parsons”) and its subcontractors, and may have discoverable information about such response activities and associated response costs: Deborah A. Weible. This entity is a Jackson County Landfill consultant and/or subcontractor, and all communications must be directed to Plaintiff’s counsel of record.

8. The following The Goodyear Tire & Rubber Company (“Goodyear”) current or former employees may have discoverable information about waste streams delivered to the Site and/or operations, and/or may have been involved in response activities conducted at the Site by Goodyear and its subcontractors, and may have discoverable information about such response activities and associated response costs: Bertram Bell; Fred C. Betzhold; Fred Bonghear; David L. Chapman; Frank Cich; Ronald Clark; Maureen DeSanzo; Jan Forsyth; Tim Frosell; John Grosjean; Skip Haines; R. L. Hively; D. H. Komaromi; Gary Kormos; Stan Levenger; Dennis E. McGavis; Kevin O’Day; Kristin Oswick; Neal Roundtree; Donald E. Stanley; Jeffrey A.

Sussman; Chris Wiley; and Bill Woodward. This entity is the Plaintiff, and all communications must be directed at Plaintiff's counsel of record.

9. The following Hydro Group, Inc. ("Hydro Group") current or former employees may have been involved in response activities conducted at the Site by ICF Kaiser Engineers, Inc. ("ICF") and its subcontractors, and may have discoverable information about such response activities and associated response costs: Mark Knoll and Gregory B. Slone. This entity is a Jackson County Landfill consultant and/or subcontractor, and all communications must be directed to Plaintiff's counsel of record.

10. The following ICF current or former employees may have been involved in response activities conducted at the Site by ICF and its subcontractors, and may have discoverable information about such response activities and associated response costs: Mike Danciak and Ed Fahnlne. This entity is a Jackson County Landfill consultant and/or subcontractor, and all communications must be directed to Plaintiff's counsel of record.

11. The following Jackson County, Ohio Board of Health ("Jackson BOH") current or former employees may have discoverable information about waste streams delivered to the Site and/or operations: J. Gordon Morrow; Charles F. Terry; and Warren Tyler. The last known contact information in Plaintiff's possession for such employees is as follows:

Jackson County, Ohio Health Department
200 Main St.
Jackson, OH 45640

12. The following Jackson County Landfill ("JCL") f/k/a Jenkins Sanitary Landfill former employees may have discoverable information about waste streams delivered to the Site and/or operations: Lori Baps n/k/a Lori Michaels; Mike Blackburn; Cletus Bush; Mike Bush; Rodney Bush; Carl Byrd; "Junior" Byrd; James Cox; Kevin Dalton; Herbert Duhl; Ed Evans;

Paul Fry; Dale Groves; Charvel "Charlie" Hopper; Donald Jenkins; James Keller; Harry Kuhn; Marvin Landrum; Hugh Livesay; Jerry Mannering; David Paugh; Bill Pearce; Dale Rose; James Sands; Jerry Scarberry; Robert Shaw; Kenny Sheritt; Douglas Simms; Dave Smalley; Jan Smith; and Mark Wyant. The last known contact information in Plaintiff's possession for such employees is as follows:

Lori Baps n/k/a Lori Michaels
Address Unknown
740-418-4009

Mike Blackburn
2855 Gieke Ridge Rd.
Oak Hill, OH 45656

Cletus Bush
6697 S.R. 139
Jackson, OH 45640

Michael Bush
12996 S.R. 327
Wellston, OH 45692

Rodney Bush
671 Bear Run Rd.
South Webster, OH 45682

Carl Byrd
Address Unknown

"Junior" Byrd
Address Unknown

James Cox
Address Unknown

Kevin Dalton
7021 Kitty Ct.
Huber Heights, OH 45424

Herbert Duhl
647 Sternberger Rd.
Jackson, OH 45640

Ed Evans
Address Unknown

Paul Fry
Address Unknown
740-286-3943

Dale Groves
Address Unknown

Charvel "Charlie" Hopper
2181 Kessinger School Rd.
Jackson, OH 45640

James Keller
Address Unknown

Harry Kuhn
2546 Smith Bridge Rd.
Jackson, OH 45640

Marvin Landrum
20036 S.R. 93
Wellston, OH 45692

Hugh Livesay
9770 Four Mile Rd.
Jackson, OH 45640

Jerry Mannering
Address Unknown

David Paugh
3675 Cleveland Dr.
Rock Springs, WY 82901

Bill Pearce
Address Unknown

Dale Rose
27 Oak St.
Jackson, OH 45640

James Sands
Address Unknown

Jerry Scarberry
336 Chillicothe St.
Jackson, OH 45640

Robert Shaw
Address Unknown

Kenny Sheritt
Address Unknown

Douglas Simms
358 Clay Chapel Rd.
Gallipolis, OH 45631

Dave Smalley
Address Unknown

Jan Smith
135 N. David Ave.
Jackson, OH 45640

Mark Wyant
Address Unknown

13. The following Joyce Iron and Metal Co. (“Joyce Iron”) current or former employees may have been involved in response activities conducted at the Site by Parsons and its subcontractors, and may have discoverable information about such response activities and associated response costs: Jerry L. Corbin. This entity is a Jackson County Landfill consultant and/or subcontractor, and all communications must be directed to Plaintiff’s counsel of record.

14. The following Lancaster Glass Corporation (“Lancaster Glass”) current or former employees may have discoverable information about waste streams delivered to the Site and/or operations: Bob Addington; Jim Morgan; Bryce Sayer; and R.L. Snider, who Plaintiff believes can be contacted through Lancaster Glass’ counsel of record in this case.

15. The following Masco Cabinetry LLC (“Masco Cabinetry”) current or former employees may have discoverable information about waste streams delivered to the Site and/or operations: Robert Allen; Stanley Lemon; John Lewis; and Sarah C. Osterman, who Plaintiff believes can be contacted through Masco Cabinetry LLC’s counsel of record in this case.

16. The following McCutcheon Enterprises, Inc (“McCutcheon”) former employee may have discoverable information about waste streams delivered to the Site and/or operations: John J. Uskuraitis. The last known contact information in Plaintiff’s possession for such employee is as follows:

McCutcheon Enterprises, Inc
250 Park Rd
Apollo, PA 15613

17. The following Mid-American Waste Systems, Inc. (“Mid-American Waste”) current or former employee may have discoverable information about waste streams delivered to the Site and/or operations: Brian D. Riley. The last known contact information in Plaintiff’s possession for such employees is as follows:

Mid-American Waste Systems, Inc.
1006 Walnut St.
Canal Winchester, OH 43110

18. The following MidWest Environmental Services, Inc. (“MidWest Environmental”) employee may have been involved in response activities conducted at the Site by MidWest Environmental and its subcontractors, and may have discoverable information about such response activities and associated response costs: Tara D. Murphy. This entity is a Jackson County Landfill consultant and/or subcontractor, and all communications must be directed to Plaintiff’s counsel of record.

19. The following O'Brien & Gere, Inc. ("O'Brien") current or former employees may have been involved in response activities conducted at the Site by O'Brien and its subcontractors, and may have discoverable information about such response activities and associated response costs: Dave Farber; Al Farrell; Chase Forman; Ellen Hudson; Paul D. Mazurkiewicz; and Susette Prusionowski. This entity is a Jackson County Landfill consultant and/or subcontractor, and all communications must be directed to Plaintiff's counsel of record.

20. The following Ohio Department of Health ("OH Health") current or former employees may have discoverable information about waste streams delivered to the Site and/or operations: P.W. Arnold; Ivan Baker; George H. Eagle; and Kermit Mick. The last known contact information in Plaintiff's possession for such employees is as follows:

Ohio Department of Health
246 N. High St.
Columbus, OH 43215

Or

35 Chestnut St.
Columbus, OH 43215

21. The following Ohio Environmental Protection Agency ("OH EPA") current or former employees may have been involved in response activities conducted at the Site by OH EPA and its subcontractors, and may have discoverable information about such response activities and associated response costs: Sheila Abraham; David Altfater; Bill Batin; Scott Bergreen; Brian Blair; Rich Boudier; Carol Butler; Craig W. Butler; Janusz Byczkowski; Brenda Case; Mary Cavin; Timothy Christman; John Connell; Bill Damschroder; Donald E. Day; Jeff DeShon; Mardi Enderle; Kevin J. Fowler; Maria Galanti; Jerri-Anne Garl; Patrick H. Gorman; Mike Gray; Leanne Greenlee; Jim Grow; Steve Hamlin; Angela Hardesty; Dave Hunt; Kristy Hunt; Dave Johe; Kelvin Jones; Ed Kitchen; David Kline; Joseph P. Koncelik; David Kral;

Martin Kuklis; Terri McCloskey; Marilyn McCoy-Zumbro; Dennis Mishne; M. Mike McLaughlin; Mike Moschell; Melissa Moser; Scott Nally; Tony Navaroli; Michael Nihiser; Kevin O'Hara; Christine Osborne; Emily Patchen; Brian Queen; Dan Redman; Kimberly Rhoads; Mark Rickrich; Jerry K. Roberts; John Rochotte; Kenneth A. Schultz; Maggie Selbe; Rich Shank; Kelly A. Sherman; Scott D. Shermerhorn; Marc Smith; Duane A. Snyder; Joe Speakman; Dusty Renee Tinsley; Dustin Tschudy; Brian Tucker; Sheree White; and Kevin Zumbro. The last known contact information in Plaintiff's possession for such employees is as follows:

Ohio Environmental Protection Agency
50 W. Town S.
Unit 700
Columbus, OH 43215

22. The following Ohio State Highway Patrol ("OH Highway") current or former employee may have discoverable information about waste streams delivered to the Site and/or operations: David E. Redecker. The last known contact information in Plaintiff's possession for such employee is as follows:

Ohio State Highway Patrol
1970 West Broad St.
Columbus, OH 43223

23. The following OSCO Industries, Inc. ("OSCO") current or former employees may have discoverable information about waste streams delivered to the Site and/or operations: Ron Bonzo; Jeff Burke; John Burke; Ryan Burke; Keith Denny; Gary E. Fischer; Harry Gulley; Sue Hamilton; Vern Lindemuth; Art Merion; Randy Messer; Roger McPeck; Tom Stewart; Mike Wallace; and John White, who Plaintiff believes can be contacted through OSCO Industries, Inc.'s counsel of record in this case.

24. The following Owens-Illinois, Inc. ("Owens") current or former employees may have discoverable information about waste streams delivered to the Site and/or operations: John Radcliffe; Susan Smith; Mark Tussing; and Susan Wiciak. The last known contact information in Plaintiff's possession for such employees is as follows:

Owens-Illinois, Inc.
1 Michael Owens Way
Perrysburg, OH 43551

25. The following Parsons current or former employees may have been involved in response activities conducted at the Site by Parsons and its subcontractors, and may have discoverable information about such response activities and associated response costs: Bill Adams; Patrick Bough; Peter Gelman; Aaron Mackey; Elizabeth McCartney; Eric Mysona; and Keith Rankin. This entity is a Jackson County Landfill consultant and/or subcontractor, and all communications must be directed to Plaintiff's counsel of record.

26. The following R. J. Reynolds Tobacco Holding, Inc. ("R. J. Reynolds Tobacco") current or former employees may have discoverable information about waste streams delivered to the Site and/or operations: Doc Eckleburg and Albert F. Schuhardt, who Plaintiff believes can be contacted through R. J. Reynolds Tobacco Holding, Inc.'s counsel of record in this case.

27. The following Ramboll Americas Integrated Solutions, Inc. ("Ramboll") current or former employee may have been involved in response activities conducted at the Site by Ramboll and its subcontractors, and may have discoverable information about such response activities and associated response costs: Victor Warner. This entity is a Jackson County Landfill consultant and/or subcontractor, and all communications must be directed to Plaintiff's counsel of record.

28. The following Rural Action f/k/a Appalachian Ohio Public Interest Campaign current or former employee may have discoverable information about waste streams delivered to the Site and/or operations: Marty Zinn. The last known contact information in Plaintiff's possession for this individual is as follows:

Rural Action
9030 Hocking Hills Dr.
The Plains, OH 45780

29. The following Sanitation Commercial Services, Inc. ("SCS") current or former employees may have discoverable information about waste streams delivered to the Site and/or operations: Tony Azar; Linda Bondurant; J. Gregory and Sally A. Fields; Mike Holdren; Mike Patrick; Martin S. Seltzer; Jack Tipton; and Mark Wood. The last known contact information in Plaintiff's possession for these individuals is as follows:

Sanitation Commercial Services, Inc.
156 W. South St.
Jackson, OH 45640

30. The following Sexton's Excavating ("Sexton") current or former employees may have been involved in response activities conducted at the Site by Sexton and its subcontractors, and may have discoverable information about such response activities and associated response costs: Shawn and Melissa Sexton. This entity is a Jackson County Landfill consultant and/or subcontractor, and all communications must be directed to Plaintiff's counsel of record.

31. The following The Manville Co. a/k/a Johns-Manville Corporation ("Manville") current or former employees may have discoverable information about waste streams delivered to the Site and/or operations: Greg Berry; Emerson Bungard; Donald Burch; Christine Burkett; David Burgord; Gary Buskirk; Melody Dunbar; Cathy Dyer; Dexter (Leroy) Flanary; Glen Ford; Larry Hill; Susan Key; Pat Klug; Mary Laughery; Judson Lewis; H. McCullough; Ron Morgan;

Richard Quaranta; Steve Rapp; Bruce Ray; N.L. Schilling; Robert Schoolcraft; Leroy Seymour; Jeff Shock; Roger Snow; Kevin W. Sprague; Janey Wigal; Jerry Williams; Jonny Woods; and Dave Young. The last known contact information in Plaintiff's possession for these individuals is as follows:

Johns-Manville Corporation
P. O. Box 5108
Denver, CO 80217-5108

32. The following Wear-Ever Aluminum Co. former employees may have discoverable information about waste streams delivered to the Site and/or operations: Dr. Pat Atkins; William Beatty; Keith B. Burns; Gary Crouth; Edward Maziarz; James T. McMaster; Jess J. Schneil; Pete Swallow; James P. Young; and Christopher Zachweija. Additionally, the following Alcoa Corporation ("Alcoa") current or former employee may have discoverable information about waste streams delivered to the Site and/or operations: Peter V. Swallow. The last known contact information in Plaintiff's possession for such employees is as follows:

Alcoa Corporation
201 Isabella St.
Suite 500
Pittsburgh, PA 15212-5858

33. The following Wellston Aerosol Manufacturing Co. a/k/a Wellston Aerosols former employees may have discoverable information about waste streams delivered to the Site and/or operations: Dan Lockard; Dan Lockard Jr. and William Kisor. The last known contact information in Plaintiff's possession for such employees is as follows:

Wellston Aerosol Manufacturing Co. a/k/a Wellston Aerosols
105 West A. Street
Wellston, OH 45602

34. The following individuals currently own property (or have owned property in the past), which is adjacent to the Site, and may have discoverable information about Site operations:

Shawn, Melissa, and Gary Sexton. The last known contact information in Plaintiff's possession for these individuals is as follows:

Shawn, Melissa, and Gary Sexton
2336 Smith Bridge Rd
Jackson, OH 45640-8843

35. The following persons are identified on Jackson County Landfill Site Records ("Site Records") as affiliated with multiple companies and may have discoverable information about waste streams delivered to the Site and/or Site operations: Sandy Adams f/k/a Sandy Leedy; Steve Himelrick; Jack Roderick; and Michael Wildman. The last known contact information in Plaintiff's possession for these individuals is as follows:

Steve Himelrick
2762 Hickson Rd.
Chillicothe, OH 45601

Sandy Adams f/k/a Sandy Leedy
2346 Walnut Creek Rd.
Chillicothe, OH 45601

Jack Roderick
135 N. High St.
Jackson, OH 45640

Michael Wildman
110 Florence Ave.
Jackson, OH 45640

36. The following individual may have discoverable information about waste streams delivered to the Site and/or Site operations: Agnes Martin. The last known contact information in Plaintiff's possession for this individual is as follows:

Agnes Martin
18065 S.R. 93
Jackson, OH 45640

Rule 26(a)(1)(A)(ii): A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Plaintiff refers Defendants to the documents being disclosed with these Rule 26(a)

Disclosures, which are Bates-labeled with a “GY” designation and can be viewed and downloaded at the following Dropbox link:

<https://www.dropbox.com/sh/63lojtn9y2q3z0/AAC4XiRTeI-CI9cUL-0vdQHFfa?dl=0>

Plaintiff also refers Defendants to Exhibit A enclosed with these Rule 26(a) Disclosures, which is a detailed index of the documents Plaintiff is disclosing with these Rule 26(a) Disclosures. Certain administrative records are included with these Initial Disclosures; however, some or all administrative records included with these Initial Disclosures are publicly and equally available to all parties at the following public information locations:

Jackson City Library
21 Broadway St.
Jackson, OH 45640

Or

Ohio EPA
Southeast District Office
2195 Front St.
Logan, OH 43138

Plaintiff will continue to identify documents as discovery proceeds and these Disclosures will be supplemented accordingly.

Rule 26(a)(1)(A)(iii): a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Exhibit B to these Rule 26(a) Disclosures is a chart of response costs (damages) incurred by Plaintiff through the date of these Disclosures. This chart contains references to the Bates numbers of response cost invoices that can be viewed and downloaded at the following Dropbox link:

<https://www.dropbox.com/sh/63lojtn9y2q3z0/AAC4XiRTeI-CI9cUL-0vdQHFfa?dl=0>

In addition, pursuant to CERCLA Section 107(a), 42 U.S.C. § 9607(a), Plaintiff is entitled to recover pre-judgment interest on Defendant's respective equitable shares of response costs. For past response costs, pre-judgment interest accrues from the earliest of the date each respective Defendant received a demand letter from Plaintiff or received notice of this lawsuit. Pre-judgment interest on future costs accrues from the date of expenditure. Interest rates are variable. The applicable rate is the same as specified for interest on investments of the Hazardous Substance Superfund, which is determined by the Department of the Treasury.

Plaintiff will continue to incur response costs (damages) at the Site and these Disclosures will be supplemented accordingly.

Rule 26(a)(1)(A)(iv): for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable.

Rule 26(a)(2) Expert Disclosures

Rule 26(a)(2)(A): . . . the identity of any witness [a party] may use at trial to present evidence under Federal Rule of Evidence 702, 703, or 705.

Plaintiff may use Dr. Kirk W. Brown as an expert witness to testify on the nature and content of the waste streams attributable to Defendants at the Jackson County Landfill Site. Additionally, Plaintiff may use Mr. Matthew Low as an expert witness to testify on the proper allocation of each party's equitable share of liability.

Rule 26(a)(2)(B): . . . this disclosure must be accompanied by a written report—prepared and signed by the witness—if the witness is one retained or specially employed to provide expert testimony in the case or one whose duties as the party's employee regularly involve giving expert testimony. The report must include:

- (i) a complete statement of all opinions the witness will express and the basis and reasons for them;*
- (ii) the facts or data considered by the witness in forming them;*
- (iii) any exhibits that will be used to summarize or support them;*
- (iv) the witness's qualifications, including a list of all publications authored in the previous 10 years;*
- (v) a list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition; and*
- (vi) a statement of the compensation to be paid for the study and testimony in the case.*

Regarding Dr. Kirk W. Brown, Plaintiff discloses the following reports containing the statement of opinions, facts or data considered, exhibits, witness qualifications, and past expert testimony, which have been previously disclosed to Defendants when Plaintiff filed them as Exhibits to Plaintiff's Motions for Partial Summary Judgment against each Defendant:

Affidavit of Dr. Kirk W. Brown in Opposition to Defendant ConAgra Foods, Inc., Bates-labeled Nos. GY0000239–GY0000321, also filed with Dkt. No. 71;

Affidavit of Dr. Kirk W. Brown in Opposition to Defendant General Mills, Inc., Bates-labeled Nos. GY0000156–GY0000238, also filed with Dkt. No. 70;

Affidavit of Dr. Kirk W. Brown in Opposition to Defendant Inland Products, Inc., Bates-labeled Nos. GY0000322–GY0000398, also filed with Dkt. No. 69;

Affidavit of Dr. Kirk W. Brown in Opposition to Defendant Lancaster Glass Corporation, Bates-labeled Nos. GY0000798–GY0000875, also filed with Dkt. No. 68;

Affidavit of Dr. Kirk W. Brown in Opposition to Defendant Masco Cabinetry LLC Bates-labeled Nos. GY0000399–GY0000476, also filed with Dkt. No. 67;

Affidavit of Dr. Kirk W. Brown in Opposition to Defendant National Oilwell Varco, Inc., Bates-labeled Nos. GY0000477–GY0000554, also filed with Dkt. No. 66;

Affidavit of Dr. Kirk W. Brown in Opposition to Defendant OSCO Industries, Inc., Bates-labeled Nos. GY0000555–GY0000631, also filed with Dkt. No. 65;

Affidavit of Dr. Kirk W. Brown in Opposition to Defendant R.J. Reynolds Tobacco Holdings, Inc., Bates-labeled Nos. GY0000715–GY0000797, also filed with Dkt. No. 64;

Additionally, as a statement of compensation, Plaintiff discloses Plaintiff's Retention Agreement with Dr. Kirk W. Brown, Bates-labeled Nos. GY0001877–GY0001883, and two paid invoices, Bates-labeled Nos. GY6001200, GY6001201. All of the above-referenced documents are indexed on the attached Exhibit A and included in the Dropbox link referenced above.

Regarding Mr. Matthew Low, Plaintiff discloses the following report containing the statement of opinions, facts or data considered, and exhibits, which were previously disclosed to each Defendant with pre-litigation settlement offers:

Jackson County Landfill Site Allocation Report, Bates-labeled Nos. GY0002258–GY0002271

Attachment 2 – Allocation Percentage Calculations, Bates-labeled Nos. GY0000004–GY0000005

Additionally, Plaintiff discloses the following document containing Mr. Low's witness qualifications and past expert testimony:

Matt Low Resume and List of Cases, Bates-labeled Nos. GY0002230–GY0002252.

Additionally, as a statement of compensation, Plaintiff discloses Plaintiff's Retention Agreement with Matthew Low, Bates-labeled Nos. GY0002253–GY0002257, and one paid invoice, Bates-labeled No. GY6001234.

All of the above-referenced documents are indexed on the attached Exhibit A and included in the Dropbox link referenced above.

Plaintiff reserves its right to supplement these Disclosures as information and documents become available.

Dated: June 22, 2021

Respectfully submitted,

/s/ Jeffrey D. Talbert

Jeffrey D. Talbert (admitted *pro hac vice*),
Trial Attorney
James W. Beers, Jr., Esq. (admitted *pro hac vice*)
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ashaffie@justislawfirm.com

ATTORNEYS FOR PLAINTIFF THE
GOODYEAR TIRE & RUBBER COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on June 22nd, 2021, a copy of the foregoing Plaintiff's Rule 26(a) Initial Disclosures, with Exhibits A and B, and Plaintiff's Rule 26(a)(2)(B) Expert Disclosures were transmitted via electronic mail to the following counsel for Defendants:

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